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Via ECF

May 20, 2025

Hon. Cathy L. Waldor, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

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**Re: Nano Fire LLC v. Halma PLC et al.
Case No. 23-cv-3562-BRM-CLW**

Dear Judge Waldor:

We represent Plaintiff Nano Fire LLC ("Plaintiff") in the above-mentioned matter. During our conference before Your Honor on Tuesday, May 13, 2025 (*re* the issues in ECF Nos. 71 and 72), Plaintiff acceded to Defendants' demand that it file a Motion for Authorization to include in the Parties' Proposed Pretrial Scheduling Order a deadline by which Plaintiff Nano Fire LLC shall serve its **amended** asserted patent claims and its amended infringement contentions on Defendants (the "Motion").

We note that because of the issues in ECF Nos. 71 and 72, the Parties have yet to file their final stipulated Proposed Pretrial Scheduling Order in response to ECF No. 67. To this end, and per Your Honor's instructions, the parties have conferred and submit the following briefing schedule:

Initial Filing Deadline:	June 13, 2025
Deadline for Opposition:	June 23, 2025
Deadline for Reply:	June 30, 2025
Return Date:	July 7, 2025

If acceptable to the Court, we ask that Your Honor "so order" this schedule. Should the Court have any questions, please do not hesitate to reach out to counsel.

Respectfully submitted,

s/ Michael J. Cohen

Michael J. Cohen

-and-

Panagiota Betty Tufariello (admitted *pro hac vice*)

Cc: All counsel of record (via ECF)